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**Subject:** Discussion Items for 8/16 RPAC Mtg  
**Date:** 08/14/2007 10:24 AM

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Sean & Kristine,

DEQ reviewed EPA's August 6, 2007 draft letter from EPA to Sanofi-Aventis and Starlink Logistics (SLLI) regarding source control at the Rhone Poulenc site. **DEQ most strongly urges you not send the subject letter until we have had a chance to further discuss the letter which can be done during the RPAC 8/16 DEQ/EPA premeeting.** It is important that DEQ & EPA attempt to agree on the site conditions, the need & timing for source control, the focus of source control, & the message before EPA sends a letter such as this.

I understand EPA's draft letter came from a request from Matt to Sean to convey 2 messages from EPA to SLLI: 1) present EPA's expectations for RPAC source control to support the Arkema EA, & 2) present any EPA expectations that are not addressed by the current RPAC source control schedule. I think Sean conveys these messages in the draft letter, but they're different messages than what DEQ has had for SLLI source control & we either need to: 1) reach closer agreement on the messages, or 2) make sure that these are indeed the messages EPA wants to send.

I'd like to discuss the following 5 topics in our 8/16 DEQ/EPA mtg:

1) What's the EPA/DEQ shared vision & schedule for RPAC source control?

2) Is the RPAC GW plume a high priority for source control? Much of this question really comes down to whether dioxin actually occurs in the RPAC plume at concentrations of concern to the river. If dioxin doesn't threaten the river, then it's an open question of whether the site is a high priority & whether source control should be required based upon relatively minor VOC exceedance of mainly drinking water standards.

We understand EPA's position is that since a portion of the RPAC plume discharges into an Early Action area, the JSCS process we typically follow may not be appropriate. However, if the RPAC plume doesn't pose a threat of recontamination (i.e., no dioxin); the plume poses a marginal drinking water pathway risk; & DEQ is working with the RP on a comprehensive upland RI/FS & source control effort..., is the immediate source control effort EPA calls for justified or worth the commitment of limited resources at this time?

3) If source control is needed, what type of source control should be implemented? EPA's draft letter states that a 2-tier hydraulic control system is required. What's that based on? At a minimum, a source control measure should be based on an EE/CA or FFS.

4) Is DEQ's project schedule inadequate? DEQ negotiated the following source control schedule with RPAC:

- Source control evaluation to be completed in winter 2007,
- Source control alternatives evaluation to be completed in 2008, &
- Source control remedy selection & implementation in 2009.

We ask why does EPA believe this schedule to be inadequate?

5) How does source control balance with other RPAC project priorities? If the GW plume truly does pose a Medium Priority threat to the river (i.e., no dioxin), how does source control match-up with other site priorities such as:

- FS for source area (RPAC property), evaluate containment alternatives (current schedule is

Final RI 2008, FS early-2009),

- Complete West Doane Lake IRAM,
- Complete Lake Area drum investigation removal, &
- North Doane Lake ecological risk assessment & FS

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